BAILEY LAW

PC

March 30, 2018

VIA ECF

The Honorable Valerie Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: Bhutan International Festival, Limited, Bhutan Dragon Events and Festivals, Limited v. Eden Project, Eden Project Limited, EdenLab and EdenLab Ltd., Case No. 1:17-cv-08980-VEC

Dear Judge Caproni:

We represent plaintiffs Bhutan International Festival, Limited, and Bhutan Dragon Events and Festivals, Limited, in the above-referenced action and write to request an extension of time, until June 1, 2018, to take default proceedings against defendants EdenLab and EdenLab Ltd.

The reason for this request is that, frankly, plaintiffs were unexpectedly taken aback by these defendants' default posture (*see* First Amended Complaint filed today, additional jurisdictional allegations); plaintiffs have therefore engaged investigators to look into EdenLab and its current status; that is, before undertaking expensive proceedings here and in the UK to enforce a default, plaintiffs seek additional time to determine whether such effort would be worthwhile.

We thank the Court for its consideration of this request.

Respectfully submitted,

Edward G. Bailey

cc: Mark Hyland, Esq. (via email)